

Glasgow City Council planning application 10/02890/DC: Erection of non-food retail warehouse (50,000sq ft) and formation of associated parking – amendment of condition NC(b)(a) of planning permission 97/02406/DC to amend the restriction limiting sales from bulky goods only to the sale of any non-food items.

West Dunbartonshire Council objects to planning application **10/02890/DC** for the proposed amendment of condition NC(b)(a) of planning permission 97/02406/DC to allow for the sale of a full range of non-food goods in the development permitted by that planning permission. The amendment fundamentally changes the nature of the development previously proposed to the extent that it should be treated as an entirely new proposal.

West Dunbartonshire Council's concerns relate to the impact of the proposed development on current trading and future investment in Clydebank town centre.

Scottish Planning Policy

Scottish Planning Policy requires that a sequential approach be used when selecting locations for retail development. Town centres are the preferred location, followed by edge-of-centre sites, then commercial centres and finally out-of-centre sites easily accessible by a choice of transport modes. Clydebank town centre and its edge-of-centre retail parks are therefore sequentially preferable to Great Western Retail Park, and are of a proximity to Great Western Retail Park to enable it to serve a similar catchment as the proposed development.

The applicant has discussed sequentially preferable opportunities in and adjoining Clydebank town centre with officers of West Dunbartonshire Council. These were the former Co-operative department store on Sylvania Way South, the Playdrome site, the site of the Council offices on Rosebery Place (if available following relocation) and Queens Quay. The applicant has dismissed all of these opportunities as either unsuitable or unavailable.

However, it is considered by West Dunbartonshire Council that the following sequentially preferable opportunities are suitable and either available or could become available in a reasonable timeframe:

Former Co-operative department store, Sylvania Way South – this traded as a non-food department store until very recently when the Co-operative reduced its operations. A current application for reconfiguration of the available floorspace shows approximately 4420 sq.m of floorspace available over 4 floors.

Playdrome, Abbotsford Road, Clydebank – the Council is planning to relocate the Playdrome leisure centre to Clydebank waterfront. This would make the current Playdrome site available for retail development. The Council's preference is for a supermarket development on the site, but as a town centre site non-food retail could also be acceptable.

Scottish Planning Policy requires developers to be flexible in applying the sequential approach, and it is considered that, with flexibility, these two opportunities are effective.

It is accepted that the other sites considered by the applicants in terms of Clydebank are either not suitable and/or available within reasonable timeframes.

Paragraph 64 of Scottish Planning Policy requires that when a proposed retail development is contrary to the development plan, it should be ensured that:

- the sequential approach to site selection has been used – this is addressed above.
- there is no unacceptable individual or cumulative impact on the vitality and viability of the identified network of centres – the impact of this development on Clydebank town centre is not acceptable to West Dunbartonshire Council. Whilst the applicant estimates the impact on Clydebank town centre in financial terms to range from £2.88-£3.36M, or 1.7-1.9%, this adds to the cumulative impact on Clydebank town centre from non-town centre locations such as Braehead, and significant expenditure that will be drawn to the approved developments at Glasgow Harbour and South Street. This cumulative impact puts Clydebank's role as a successful strategic centre at risk.
- the proposal will help to meet qualitative and quantitative deficiencies identified in the development plan – no quantitative deficiencies have been identified in the development plan, nor has the applicant demonstrated these. The applicant highlights qualitative deficiencies in the non-food offer of Drumchapel town centre, but does not address that Clydebank town centre is in such close proximity to Drumchapel so as to serve as its main non-food shopping centre. The criterion requires quantitative and qualitative deficiencies to be addressed.
- the proposal does not conflict with other significant objectives of the development plan or other relevant strategy – as well as being in the network of strategic centres, Clydebank town centre is an integral part of the Clyde Waterfront, a core component of the Strategic Development Plan Spatial Development Strategy.

Overall, it is not considered that the proposed development can be justified by Scottish Planning Policy as a departure from the development plan.

Glasgow & the Clyde Valley Strategic Development Plan

The SDP serves as the 'top-tier' of the development plan in the Glasgow and Clyde Valley area and is a relevant consideration in development management considerations. The proposal is for 4,645 sq.m of retail floorspace, which is considered to be significant.

Diagram 4 of the Plan sets out a sustainable location assessment for development proposals. It requires that if the proposal is in line with the Spatial Development Strategy and whether it supports its spatial role and function. The proposed development is not within a location identified by the Spatial Development Strategy. The proposal therefore requires to be assessed against the 'Supply-side: Sustainable location assessment' criteria of Diagram 4, which assesses if the proposed development will contribute positively to the Spatial Development Strategy. The most relevant of these criteria relate to the network of centres. The proposed

development site is not part of the SDP network of centres. Therefore, it is not considered to support the network of centres. Instead, it is likely to have an adverse impact on Clydebank town centre, which does form part of the network of strategic centres. The proposal would also have a small impact on Glasgow city centre, but considered cumulatively, it would strengthen one of now many alternative retail destinations, all of which have impacted on city centre trade in recent years. With regard to sustainable access issues, the proposed development site is in a location on the A82 that will be predominantly reached by private car, unlike Clydebank town centre which is served by rail and many bus services, including regular services from Drumchapel. Overall, the proposed location is not considered to be a sustainable one.

Diagram 4 also asks if there is a known need/demand for the development established in the Development Plan. The Strategic Development Plan does not establish the need for this development at this location. Neither does the applicant demonstrate need for the development by way of a capacity assessment. It is therefore concluded that there is no known need/demand for the development.

In summary with regard to Diagram 4, the proposed development is not considered to contribute positively to the Spatial Development Strategy of the Strategic Development Plan or for there to be a known need/demand for it.

Strategy Support Measure 11 of the Strategic Development Plan requires the community role and diversity of function of the network of strategic centres, which includes Clydebank, to be safeguarded and developed. In Schedule 12, expenditure leakage is identified as a challenge facing Clydebank town centre. The proposed development would worsen this situation. Strategy Support Measure 11 also requires the long-term health and well-being of Glasgow City Centre to be reflected in development management decisions. The applicant indicates that the proposed development will draw trade from the city centre, and the cumulative impact of this should be a consideration in assessing the proposal.

Comments on applicant's submission

Para 1.24 – it is not accepted that the impact of the proposed floorspace on Clydebank town centre would be similar if it were to be located in Drumchapel town centre. The Great Western Retail Park site, whilst not a town centre, is more accessible to the north west Glasgow/Clydebank catchment, albeit by private car, and would become more of a destination if this development was permitted. The impact of this additional floorspace on Clydebank town centre would be significantly greater if located at Great Western Retail Park rather than Drumchapel town centre.

An argument is made that residents of Drumchapel should not have to travel to Clydebank Anniesland or Drumchapel to undertake comparison shopping. Clydebank town centre has served as a comparison shopping location for the north west Glasgow catchment including Drumchapel for some time, and continues to be used by shoppers from Drumchapel for comparison shopping. This has not previously been considered unreasonable and should not be now.

Conclusion

West Dunbartonshire objects to planning application **10/02890/DC**. The proposal is considered to be contrary to Scottish Planning Policy and the Strategic Development Plan. Reasons for this include the availability of sequentially preferable sites, the impact, including cumulative impact, on Clydebank town centre and Glasgow city centre, and the lack of demonstrated need/demand for the development.

Whilst the proposal may be for what seems to be a minor change to an existing permission, it would remove a condition that made that development acceptable to Glasgow City Council in the first place, and allow it to be developed in a form that was previously not acceptable to the City Council, and is not acceptable to West Dunbartonshire Council. No evidence has been presented as to why an open non-food development would be any more acceptable at this location now. Rather, the development as currently proposed would add to the impact on Clydebank town centre and Glasgow city centre from centres such as Braehead and Silverburn that have emerged since the permission was originally issued.